

George Haines, Esq.
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Attorney for Debtors

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In Re:

STEVE PANDI,

Debtor(s).

Case No: BK-S-20-10243-BTB
Chapter 13

Hearing Date: 5/21/2020
Hearing Time: 10:00 a.m.

DECLARATION OF GEORGE HAINES, ESQ.

George Haines hereby declares the following under penalty of perjury:

1. I am an attorney duly licensed to practice law in the State of Nevada and I am an attorney in the law firm of HAINES & KRIEGER, LLC, with offices located at 8985 S. Eastern Avenue, Suite 350, Las Vegas, Nevada 89123.
2. I am counsel for Debtor in the above Chapter 13 proceeding. I have personal knowledge of the matters set forth herein and, if called as a witness, could and would competently testify thereto.
3. I submit this Declaration in support of the above-referenced matter and as proof of time spent and costs advanced on the above-referenced matter.
4. On March 26, 2020, Debtor filed his Motion to Determine Bavarian Motors LTD.'s Willful Violation of the Automatic Stay and Request to Recover Punitive Damages, Attorney's Fees and Sanctions ("Motion for Sanctions"). (See ECF No. 29).

5. On May 21, 2020, a hearing on the Motion for Sanctions was held and the Plaintiff was awarded damages including attorneys' fees.
6. With regard to the attorneys' fees awarded, Haines and Krieger, LLC has spent the following billable time and incurred the following expenses relating to this matter:

<u>DATE</u>	<u>H&K EMPLOYEE</u>	<u>DESCRIPTION</u>	<u>TIME SPENT</u>
3/17/2020	PM	Spoke with Bavarian Motors. Creditor will not release vehicle	.3
3/19/2020	GHH	Start preparing Motion for Sanctions and prepare Retainer Agreement	.7
3/20/2020	ON	Open file, draft motion for sanctions, prepare draft declaration in support of motion for sanctions, prepare exhibits	3.5
3/23/2020	GHH	Revise motion for sanctions	.4
3/23/2020	GHH	Revise motion for sanctions	.3
3/26/2020	RLF	Prepare mailing and serve motion for sanctions, declaration and NOH	0.8
5/21/2020	BC	Review case notes, prepare for hearing and attended hearing	1.2
5/23/2020	GHH	Preparation of Declaration of Fees	.9

7. Based upon the above, Haines and Krieger spent approximately 18.7 hours (including an estimated 1.5 hours for the evidentiary hearing) on this matter distributed by employee type as seen below:

Paralegal (RLF & SS):	.8
Senior Paralegal (PM):	.3
Associate Attorney (ON & BC):	4.7
Partner (GHH):	2.3

8. Our standard hourly rates are as follow:

Paralegal (\$165.00/hr):	\$132.00
Senior Paralegal (\$185/hr):	\$55.50

Associate Attorney (\$495/hr): \$ 2,326.50

Partner (\$595/hr): \$ 1,368.50

Accordingly, the fees incurred by Haines & Krieger, LLC to date is **\$3,893.50.**

9. Haines & Krieger, LLC has also incurred certified mailing charges in the amount of \$35.40 for total costs in the amount of **\$35.40.**
10. I declare under penalty of perjury that the foregoing is true and correct.

DATED: May 27, 2020

/s/ George Haines .
George Haines, Esq.
Nevada Bar No. 941
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Counsel for Debtors